

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

DOUGLAS JOHNSON,

Plaintiff,

V.

**COOK COUNTY SHERIFF THOMAS
DART, in his official capacity,
ANTWAUN BACON, a CCDOC officer, and
COOK COUNTY, a municipal corporation,**

Defendants.

22-cv-3718

Hon. Robert W. Gettleman

Hon. Mag. Heather K. McShain

UNOPPOSED MOTION TO EXTEND EXPERT DISCOVERY
DEADLINES

Now comes the Plaintiff DOUGLAS JOHNSON, by and through the undersigned counsel of DVORAK LAW OFFICES, LLC, and moves this honorable Court to extend the expert discovery deadlines. In support of this motion, the Plaintiff states the following:

1. The Plaintiff's expert disclosures are due on July 3, 2024.
2. The hand and wrist specialist that the Plaintiff intended to disclose has identified a conflict of interest and is unable to produce a report for the Plaintiff.
3. The Plaintiff therefore asks for 60 additional days, up to and including September 3, 2024, to make his expert disclosures.
4. The Plaintiff proposes that the deadline for the deposition of said expert be October 3, 2024.
5. The Plaintiff proposes that the respective deadlines for the disclosure and deposition of any expert(s) retained by the Defendants be November 4, 2024, and December 4, 2024, respectively.

6. Defendants do not oppose this motion.

Wherefore, for all of the reasons stated above, the Plaintiff asks that the discovery deadlines be extended 60 days, as outlined in this motion.

Respectfully Submitted,

/s/ Adrian Bleifuss Prados
Adrian Bleifuss Prados
Counsel for the Plaintiff

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on June 21, 2024, he served a copy of the above motion upon counsel of record, via the Court's e-filing system.

/s/ Adrian Bleifuss Prados
Adrian Bleifuss Prados
Counsel for the Plaintiff

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